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Attorney for: Defendant Daniel Rangel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DANIEL RANGEL,

Defendant.

CR NO. 07-00788 JF (NJV)

STIPULATION AND [PROPOSED] ORDER
TO AMEND CONDITIONS OF RELEASE
TO ALLOW DEFENDANT TO TRAVEL
FOR WORK

Defendant Daniel Rangel, through his attorney, and the United States, through its attorney, hereby stipulate and move this Court to amend Mr. Rangel's conditions of release to allow him to travel as needed for his employment and with the approval of his Pretrial Services Officer within the United States. The reasons are as follows.

Mr. Rangel is employed as a truck driver for a moving and storage company. His work frequently requires him to travel to different states. At the bail hearing, the parties agreed, and the Magistrate Judge ordered, that he be permitted to travel for employment within the states of California, Oregon, Washington, Nevada and Utah. Subsequently, however, Mr. Rangel received an assignment from his employer that would take him to the East Coast, and to and through numerous states that are not on the list already approved by the Court. It is in the interests of all concerned that Mr. Rangel be able to maintain employment and earn a living while on bail.

STIPULATION AND PROPOSED ORDER TO AMEND CONDITIONS OF RELEASE, U.S. V. DANIEL RANGEL, CR NO.

1 Accordingly, the parties have stipulated that his conditions of release may be modified to allow
2 travel within the United States for purposes of employment and with the approval of his Pretrial
3 Services Officer. The Order should also require Mr. Rangel to provide his Pretrial Services
4 Officer with his itinerary before any such travel.

5 The parties therefore respectfully request an Order amending his conditions of release to
6 allow him to travel as specified above.

7 Dated: March 13, 2008

Respectfully submitted,

8
9 */s/ Mark D. Eibert*

10 MARK D. EIBERT
11 Attorney for Defendant Daniel Rangel

12 */s/ Jeff Nedrow*

13 JEFF NEDROW
14 Attorney for the United States

15 **ORDER**

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17 Good cause appearing therefore, it is hereby ORDERED that defendant Daniel Rangel
18 may travel within the United States for employment purposes, subject to the prior approval of his
19 Pretrial Services Officer. Mr. Rangel shall also provide his Pretrial Services Officer with his
20 itinerary prior to any such travel.

21 Dated: March ____, 2008

22 UNITED STATES MAGISTRATE JUDGE